UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) CRIMINAL NO. 05-cr-30032-MA
)
LUZ TORRES,)
GABRIEL ORTIZ,)
and)
LUIS RIVERA,)
)
)

JOINT MOTION FOR A CONTINUANCE

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, Defendant Torres, through Attorney Joseph Bernard, Defendant Ortiz, through Attorney Levinson, and Defendant Rivera, through Attorney Mastroianni, respectfully request this Court to continue this case for a final status date on a date convenient for the Court after November 28, 2005.

In support of this motion the government states that each of the above listed attorneys requests more time to review the discovery with their respective Defendant and to prepare pretrial motions. The attorneys have informed me that they are not yet ready to decide whether a trial will be necessary. A continuance is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth

Assistant U.S. Attorney

/s/ Joseph Bernard
Joseph Bernard, Esq.
Counsel for Luz Torres

/s/ Lori Levinson Lori Levinson, Esq. Counsel for Gabriel Ortiz

<u>/s/ Mark Mastroianni</u>
Mark Mastroianni, Esq.
Counsel for Luis Rivera

Dated: November 3, 2005